

U.S. Department of Justice

*United States Attorney  
Eastern District of Virginia*

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*2100 Jamieson Avenue  
Alexandria, Virginia 22314*

*(703)299-3700*

December 10, 2002

Ms. Judith Friedman  
Senior Trial Attorney  
Office of International Affairs  
1301 New York Avenue, NW  
Washington, DC 20530

Dear Ms. Friedman:

Re: Supplemental Request in the Investigation of the Safa Group

This is a supplemental request for assistance in the above-referenced matter, based on new information, described below. All other facts remain the same as outlined in the original request, dated September 27, 2002, and are hereby incorporated by reference.

The investigation reveals that Yassin Qadi, a wealthy Saudi businessman, had an interest in and continues to have an interest in various entities in which members of the Safa Group have an ownership interest or managerial control. Qadi, who is also known as Yassin al-Qadi (aka Shaykh Yassin Abdullah Kadi; aka Yasin Kahdi; aka Yassin Kadi; aka Yasin Quadi)(in this request we shall refer to him as "Qadi") was named a Specially Designated Global Terrorist pursuant to United States Executive Order 13224 on October 12, 2001. This designation makes it illegal for any United States person or entity to conduct any transaction or dealing in property, or an interest in property, of Yassin Qadi in the United States.

Qadi was labeled a Specially Designated Global Terrorist on the basis that he and many other well-connected Saudi citizens transferred millions of dollars to Osama bin Laden through charities and trusts like the Muwafaq Foundation, (also known as Blessed Relief), supposedly established to feed the hungry, house the poor and alleviate suffering. Qadi was a trustee of Muwafaq Foundation.

Qadi was also the major source of funds for a money-laundering scheme for Hamas, involving the Quranic Literacy Institute and one of its important volunteers, Muhammad A. Salah. In 1991, Qadi, wire transferred \$820,000 from a Swiss bank account for investment purposes. The transaction was intended to conceal that the source of the money was from Qadi. Some of the money was ultimately used by Mr. Salah to help purchase weapons and reorganize the Hamas leadership in the West Bank and Gaza.

The evidence is that Yassin Qadi has had an interest in and continues to have an interest in various entities in which members of the Safa Group have an ownership interest or managerial control. Sterling Ptech Fund, LLC was founded by the Safa Group in August 2000, for the

purpose of investing in a Boston Massachusetts software firm, Ptech, Inc. The stock ledger shows that Qadi invested over \$15 million dollars into Sterling Ptech Fund, through Caravan Company Limited ("Caravan") and Sara Company Limited, which are Qadi nominees. Qadi made an additional investment of approximately \$51,000 in Sterling Ptech Fund through relatives Laila Abdallah Kadi, Kawthar Abdallah Kadi, Najiah Abdallah Kadi, Nafisah Abdallah Kadi, and Nahed Abdallah Kadi, each of whom is believed to be a nominee for Qadi.

Account number 36966325 at Faisal Finance, 84 Av. Louis-Casai, 1216 Cointrin-Geneva, Switzerland, is controlled by Caravan Development Group Limited. Caravan, which is also known as Caravan Group Limited, Caravan Group and Fourfinch, Limited, is organized under the laws of the Isle of Man. It is a company that is 50% owned by Qadi's wife, Balgis Abdul Kadir Abdul Bari Radwan, who is also a director. The other 50% is owned by Omar Saleh Saeed Al-Almoudi. The other director is Qadi's son, Maaz Yassin Abdullah Qadi. Caravan is actually controlled by Yassin Qadi.

Qadi made an investment in another United States company called Packetstream, Inc. On February 9, 2001 Caravan wire transferred \$100,000 from the account at Faisal Finance to account number 515 220 1224 in the name of the Sterling Packetstream Fund, LLC., at Branch Banking and Trust Co. in Maryland.

There are a number of other accounts at Faisal Finance in the names of companies effectively controlled by Qadi. These include account number 10741 in the name Solano, Ltd. (aka Trident Corporate Services); account number 10361 in the name of Euroinvest, Ltd.; account number 10172 in the name of Leemount, Ltd.; and account number 10257 in the name of Caravan Development. The Euroinvest, Ltd account was opened with deposits from an account in the name of Kadi and account number 10257 in the name of Caravan Development.

In addition there is an account Faisal Finance in the name of Yassin A. Kadi and several accounts at Faisal Finance in the names of Qadi's relatives. These include Balgis A.A. Radwan (DOB 12/19/60)(Qadi's wife); Nahlah Abdallah Kadi; Nahed Abdallah Kadi (DOB 11/22/64); Laila Abdallah Kadi (5/10/48)(Qadi's sister); Nafisah Abdallah Kadi (2/13/56)(Qadi's sister); Kwathar Abdallah Al Kadi (4/19/49)(Qadi's sister); Maaz Yassin Abdullah Qadi (12/22/80)(Qadi's son); Banan Yassin A. Kadi (11/20/82); Hafsah Yassin Al Kadi (10/19/84)(Qadi's son); Sahl Yassin Al Kadi (11/12/87)(Qadi's son); Hajer Y.A. Kadi (11/22/97); Sarah Yassin A. Qadhi (12/16/90).

In addition, the investigation shows that there are accounts at Faisal Finance in the names of at least four other companies which are nominees for Qadi. These include Cavallo, Ltd., of which Qadi is a director and, with his wife, owns a combined 88% interest. Qadi also is a director and has a 50% interest in NMCC, Ltd., and Loxhall, Ltd (aka Loks-Holl SHPK). Finally, Qadi also has an interest in Alla Animation Production Establishment.

The investigation shows that there is one other account at Faisal Finance which was opened with funds drawn on accounts in the names of Qadi-controlled companies. These include an account in the name of Depozitna Bank, DD, which account was opened with deposits from

account number 10172 in the name of Leemount, Ltd, and account number 10257 in the name of Caravan.

Finally, there is account number 51476 in the names of Yassin Qadi and Khalid Omar Saleh Alamoudi at Swiss Bank Corporation.

The prosecutors need the records of each of these accounts to determine the extent and duration of Qadi's investments in United States property and to determine the disposition of funds connected with those investments.

Thus, please ask Swiss authorities to provide all records of the bank accounts at Faisal Finance and Swiss Bank Corporation and certify the records in the same manner as requested in the original request for assistance.

Sincerely,

PAUL J. MCNULTY  
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to be 'S. P. Ward', written over the typed name of the Special Assistant United States Attorney.

By: Steven P. Ward  
Special Assistant United States Attorney